Sprint

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Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EX PARTE PRESENTATION
CC Docket Nos. 98-147 and 96-98

Dear Ms. Salas:

In Sprint's April 25,200 1 meeting with personnel from the Common Carrier Bureau and the Office of Engineering and Technology regarding the collocation issues pending on remand in the above-captioned proceedings, one of the issues Sprint addressed was the need for cross-connects between competitive carriers, each of which is collocated in an ILEC central office (CO). Sprint was asked if it could estimate the difference in costs between central-office, cross-connect facilities and having to interconnect, instead, at a manhole outside the central office, and was also asked, from its ILEC perspective, which method of interconnecting two competitive carriers is most efficient.

In its activities as a competitive provider of local and related services, Sprint does not have any such cross-connects in place today, and has just begun receiving quotes from ILECs for a very limited number of central offices. Thus far, Sprint has received information from Verizon regarding six central offices where Verizon is willing to allow cross-connects in the CO using its CATT offering, and from SBC regarding manhole interconnection at two COs. Based on estimates derived from Verizon's quotes, the average amount of fiber required is 601.5 feet in these six central offices.' For the two SBC offices, the total fiber required is nearly three and a half times that amount: 2,087.5 feet (consisting of two fiber runs from two manholes in order to provide diversity). Using Sprint's standard costs for fiber ($1.80 per foot) and the materials/labor cost ($13.84 per foot) derived using the quote from Verizon's vendor, the cost per site would be $9,407.46 for the CATT arrangement versus $32,648.50 at the manhole. Sprint has not yet received detailed dollar quotes from SBC, and is using the Verizon

[1] Two fiber routes are preferred in each site in order to promote diverse fiber routing (primary feed plus back-up feed). The 60 1.5 feet average is the combined average length of both fibers.

CATT quotes purely for illustrative purposes, to show the effect of additional distance on the cost of interconnection. Sprint would not be surprised if the actual quotes for manhole interconnection were substantially higher than the amount shown above because of costs at the manhole for safety measures, pumping the' manhole, setting up the fibers for splicing, and placing the splice in a hermetically sealed enclosure.

To put this $23,000 cost difference in perspective, this amounts to roughly half of Sprint's experienced costs of physical collocation in LEC central offices (which averages in the neighborhood of $47,000). Stated differently, adding ILEC-provided cross-connect facilities within the central office to another competitive carrier to the fixed collocation costs of $47,000 that Sprint is already incurring, raises the total to $56,000 per central office. Having to interconnect with another competitive carrier outside the central office raises the fixed cost of collocation to just under $80,000. This substantial added fixed cost deters competitive carriers from interconnecting with each other at (or near) central offices and further entrenches the ILECs' position as the dominant providers of interoffice transport to competitive carriers.

From Sprint's perspective as an ILEC, cross-connects at the manhole should be avoided. A manhole is necessarily a more difficult work environment than the interior of a central office. Moreover, in most instances, the first manhole outside the central office is the most congested manhole in the entire underground system, and even moving somewhat farther out from the central office the manholes tend to be quite congested. Thus, there is always a risk of inadvertently cutting fibers, disturbing or damaging the integrity of existing closures and cables, and putting large numbers of customers out of service, a concern that is particularly heightened in the congested manholes that are close to the central office. Furthermore, unlike the central office environment, where the cross-connection can utilize a fiber patch panel, such panels cannot be used in the manhole. Instead, fiber trays have to be added and individual fibers broken out and assigned to various owners in a splice closure in the manhole. This process is not designed for repeated access, is not practical, and should be avoided if at all possible, since repeated access increases the risk of damage to the fiber-to-fiber splices. Furthermore, the National Electrical Safety Code requires any fiber cable entering the building to be spliced to a fire retardant cable if it traverses more than 50 feet inside the building, after exiting the steel conduit. Thus, depending on the layout inside the central office, yet additional splices or other points of termination would be needed for each of the two fibers from the manhole. This would add a further layer of costs to the process. (The typical cost of a 24-fiber splice is approximately $1,350.00.) For all these reasons — particularly the risk

of inadvertently placing other customers out of service — the central office is a vastly preferable location for cross-connects between competitive carriers than a manhole outside the central office.

This letter is being filed electronically.

Sincerely,

Richard Juhnke

cc: Bill Kehoe
Alexis Johns
Brent Olson
Kimberly Cook
Paul Marrangoni
Jerry Stanshine